

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

Darren Lee Price Jr

Plaintiff's full name (Please print)

22 CIV 112 JFH

Case No. _____

(To be filled out by Clerk's
Office only)

v.

Core Civic Davis Correctional

Defendant(s)' full name (Please print)

Facility / Warden Mark Gentry

FILED

APR - 8 2022

PATRICK HEANEY
Clerk, U.S. District Court

By _____
Deputy Clerk

For additional names please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section IV, pursuant to Fed. R. Civ. P. 10(a).

NOTICE

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. JURISDICTION

Indicate below the federal legal basis for your claim, if known.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

II. PLAINTIFF INFORMATION

Darren Lee Price Jr. N/A
Full name Aliases

621929
Prisoner ID #

Core Civic Davis Correctional Facility
Place of Detention/Incarnation

6888 East 133rd Road
Institutional Address

Holdenville Oklahoma 74848
City State Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S)' INFORMATION

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1: Core Civic Davis Correctional Facility / Warden Mark Gentry
Full Name

Former Warden
Current Job Title

6888 East 133rd Road
Current Work Address

Holdenville OK 74848
City State Zip Code

Defendant 2: _____
Full Name

Current Job Title

Current Work Address

City State Zip Code

Defendant 3:

Full Name

Current Job Title

Current Work Address

City

State

Zip Code

Defendant 4:

Full Name

Current Job Title

Current Work Address

City

State

Zip Code

Defendant 5:

Full Name

Current Job Title

Current Work Address

City

State

Zip Code

V. STATEMENT OF CLAIMS

A. Claim 1

Date(s) of occurrence: September 23, 2021

Place(s) of occurrence: Core Civic Davis Correctional Facility | Echo Bravo-105

State which of your federal constitutional or federal statutory rights have been violated:

U.S. Constitutional Amendments -
Cruel and Unusual Punishment Clause of the 8th Amendment; Due
Process Clause of the 14th Amendment; Section Five of the 14th Amendment.
Briefly state the FACTS that support your case. Provide a short and plain statement of how each
named defendant was personally involved in the violation of your constitutional rights and why
you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case
law.

FACTS: On 9-23-2021 between the hours of 3pm-5p.m while Plaintiff, Darren Price,
was housed in Echo Bravo 105 at Core Civic Davis Correctional Facility, located at
6888 East 133rd Road, Holdenville, OK 74848 a large group of staff came to
Plaintiff, Darren Price, cell door and ordered Plaintiff, Darren Price, to strip
completely naked and exit his cell completely naked at gun point and mace
point while being recorded in front of staff and inmates (see attached labelled
V. Statement of Claims
A. Claim 1- Facts)

B. Claim 2

Date(s) of occurrence: _____

Place(s) of occurrence: _____

State which of your federal constitutional or federal statutory rights have been violated:

FACTS:

V. Statement of Claims

A. Claim 1 - Facts

unjustifiably, illegally, and wrongfully at no wrong of Plaintiff, Darren Price. The Plaintiff, Darren Price, was then forced to expose himself at several locations in the prison.

Core Civic Davis Correctional Facility cameras for Echo Bravo pod and Echo unit will show on 9-23-2021 between 3pm-5pm Plaintiff, Darren Price, was forced to exit cell number 105 on Echo Bravo completely naked at gun and mace point and walk across Echo Bravo unit to the hallway in front of Echo pod to the Echo Unit classroom, as proof.

Plaintiff, Darren Price, Request to Staff # 2021-5807 filed at Davis Correctional Facility showing review was conducted on this issue, and

Plaintiff, Darren Price, Grievance # 2021-1001-00391-G also filed at Davis Correctional Facility by Plaintiff provide support to this allegation. Plaintiff's Grievance # 2021-1001-00391-G was also exhausted with the ODOC Director on appeal by Plaintiff, Darren Price.

On 9-23-2021 between 3pm-5pm at the date and time of this incident Mark Gentry was the current facility Warden for Core Civic Davis Correctional Facility and was responsible for ensuring none of his staff violated State or Federal law, Oklahoma Department of Corrections policies or procedure, or the rights of inmates.

Core Civic Davis Correctional Facility had jurisdiction because Plaintiff, Darren Price, is and was incarcerated there at the date and time of this incident.

C. Claim 3

Date(s) of occurrence: _____

Place(s) of occurrence: _____

State which of your federal constitutional or federal statutory rights have been violated:

FACTS:

D. Claim 4

Date(s) of occurrence: _____

Place(s) of occurrence: _____

State which of your federal constitutional or federal statutory rights have been violated:

FACTS:

VI. RELIEF REQUESTED

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

Award Plaintiff, Darren Price, \$2,500,000.⁰⁰ or order
Core Civic Davis Correctional Facility / Warden Mark Gentry
or their representatives to negotiate financial compensation and
reach agreement with Plaintiff, Darren Price, to settle this claim
and financial compensation be delivered to Plaintiff, Darren
Price, and the serious incident reports from this incident be provided
to Plaintiff to reveal names of other staff involved so they can be listed as
defendants in this lawsuit.

VII. PRISONER'S LITIGATION HISTORY

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner?

☐ Yes

☒ No

If yes, how many?

N/A

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

N/A


VIII. PLAINTIFF'S DECLARATIONS:

I declare under penalty of perjury that the foregoing is true and correct. To the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11 of the Federal Rules of Civil Procedure.

I agree to provide the Court Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Court Clerk's Office may result in the dismissal of my case.



Plaintiff's Signature

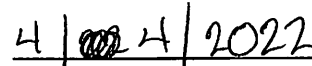


Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 4th day of April, 2022.



Plaintiff's Signature



Date